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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
DEBRA EDISON,)
)
Defendant.)

Criminal No. CR 07-0479 WHA

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME &
CONTINUING HEARING**

The above-captioned matter came before the Court on August 28, 2007. The defendant was represented by Shawn Halbert, Esq., and the government was represented by Peter Axelrod, Assistant United States Attorney. The matter was set for September 25, 2007, at 2:00 p.m. before the Hon. William H. Alsup, United States District Court Judge for status and setting of motions.

The Court made a finding that the time from and including August 28, 2007, through and including September 25, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C.

STIPULATION AND [PROPOSED] ORDER
EXCLUDING TIME
CR 07-0479 WHA

§ 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best interest of the public and the defendant in a speedy trial. The finding was based on the need for the defendant to have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C.

§ 3161(h)(8)(B)(iv).

The parties hereby agree to and request that the case be continued until September 25, 2007, and that the exclusion of time until then be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively prepare, taking into account the exercise of due diligence, and will provide for continuity of counsel for the defendant.

DATED: September 4, 2007

/s/
SHAWN HALBERT
Counsel for Debra Edison

DATED: September 4, 2007

/s/
JEFFREY R. FINIGAN
Assistant U.S. Attorney

So ordered.

DATED:

WILLIAM H. ALSUP
UNITED STATES DISTRICT COURT JUDGE